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By Email & Overnight Courier

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, MA 02110

Re: D.T.E. 01-20

Dear Secretary Cottrell:

Pursuant to the June 5, 2001 Memorandum of Hearing Officers Chin and Hickey, WorldCom, Inc. ("WorldCom") hereby responds to the "CLEC Coalition" motion for extension of time to file rebuttal testimony.

Given that Verizon's current UNE rates are so high as to act as a barrier to entry for WorldCom, we have an obvious interest in getting a final decision from the Department in this proceeding as quickly as possible. However, WorldCom's interest in getting new rates quickly does not override its interest in ensuring that the Department has the evidence necessary to decide the matter correctly. The ongoing delays in getting discovery responses from Verizon, and the complexity of the case itself, are making it more and more evident that additional time is needed for intervenors to effectively develop testimony critiquing Verizon's submission. This, in turn, requires corresponding adjustments to the remainder of the schedule (which adjustments must also factor in the complexity of the matter being litigated). For these reasons, WorldCom supports the adoption of the schedule proposed by AT&T earlier today.

WorldCom further proposes what we believe to be a partial solution to the discovery-related problems facing the intervenors in this matter; if implemented, it may shorten the overall schedule suggested by AT&T. Very briefly, WorldCom proposes that Verizon permit intervenors in this matter to use discovery materials produced by Verizon in other TELRIC dockets in other jurisdictions. Intervenors here have requested – and received – Verizon documents in litigations in other jurisdictions, which are also responsive to discovery requests posed in this matter. By virtue of Verizon-imposed protective agreements signed by WorldCom and other parties in each jurisdiction in which a TELRIC

Page 2 of 2
Mary L. Cottrell
June 7, 2001

case has been litigated, we have been precluded from using here the documents we have obtained in those other jurisdictions. WorldCom is not suggesting that jurisdiction-specific, case-specific protective agreements serve no purpose – clearly they do. But in the context of this proceeding, where many if not most of the outside consultants retained to critique Verizon's studies may have seen Verizon's proprietary materials several times over in connection with several TELRIC litigations, the only purpose being served by the restrictions of those agreements is that it permits Verizon to hamstring intervenors with delay in this case. Moreover, in the arbitration being conducted before the FCC to set TELRIC rates for Commonwealth of Virginia, Verizon itself has agreed to a procedure in which documents produced to WorldCom in other matters *can* be used without need of protracted discovery. (See attached Letter Ruling, dated March 27, 2001, Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218, 00-249 and 00-251) WorldCom believes that instituting a similar procedure in this case could expedite the conclusion of discovery in this case.

Very truly yours,

Christopher J. McDonald

cc: Service List (*by email & U.S. Mail*)